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July 24, 2024

Honorable Judge Cecelia G. Morris
 U.S. Bankruptcy Court
 Southern District of New York
 355 Main Street
 Poughkeepsie, NY 12601-3315

Re: Status Letter: Bildad Laurent and Kerlande Laurent; case no.:23-22951

Dear Judge Morris:

We represent the above referenced Debtors who have filed a 363(f) motion [ECF Dkt. No. 40 and 44] to sell their property located at 104 N. Terrace Avenue, Mt. Vernon, New York 10553 (the "Property") that was heard and adjourned from June 12, 2024, to July 31, 2024. The secured lender is Wilmington Savings Fund Society, FSB, as trustee of Upland Mortgage Loan Trust A ("Wilmington") that has stated that \$569,168.96 is owed.

In the first hearing the issue was raised that it was not clear as to the distribution of proceeds. Accordingly, this letter sets forth definitive clarification as to sale and the costs that the Debtor is requesting:

\$ 565,000	-Sale Price
\$ 5,000	-Seller's Concession (reduction of price for condition):
\$ 560,000	-Total Available Sales Proceeds
\$ 28,000	-Broker's Commission
\$ 6,910	-Seller's Transfer Taxes
\$ 1,305.50	-Pick up Fee; Real Property Disclosure Fee; Recording fee, document return fee, escrow service fee, satisfaction of mortgage fee and title closer fee
\$7,500	-legal fees related to sale, i.e. broker retention motion, preparation of contract of sale, closing, preparation of the 363 sale motion with costs,
\$43,715.50	-total costs of sale
\$516,284.50	-net to Wilmington

The Motion asks for an allowance of \$10,000 for moving costs for the Debtors; however, this allowance is subject to approval by Wilmington.

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The expenses set forth above are normal expenses that Wilmington would incur if it sold the Property either directly or through a third party and are allowable under Section 363 and 506(c) of the Bankruptcy Code.

This Court directed me to discuss this situation with Andrew Goldberg, Esq., counsel for Wilmington and advise him that if Wilmington wanted to credit bid, they needed to be prepared to do so at the next hearing.

Mr. Goldberg and I had discussions and as stated in his most recent status letter, we are attempting to resolve matters consensually.

However, if Wilmington does not credit bid at the Hearing, the Debtor respectfully requests approval of the sale under Section 353(f) of the Bankruptcy Code and asks that the above costs and expenses of sale be approved and paid at closing, except for the legal fees which will be paid to the Chapter 13 trustee for distribution to counsel as part of a fee application.

Very truly yours,

/s/ H. Bruce Bronson
H. Bruce Bronson